# EXHIBIT B

Plaintiffs' First Request for Admissions Propounded to All Defendants

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and HELEN LOVELACE, Individually, and as Parents of BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO.: 2:13-cv-02289 dkv JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.; BABU RAO PAIDIPALLI; and, MARK P. CLEMONS,

Defendants.

## PLAINTIFFS' NOTICE OF SERVICE OF DISCOVERY PLEADINGS

#### TO: ALL COUNSEL OF RECORD

Notice is hereby given that, on the date entered below, Mark Ledbetter served upon all defense counsel named in the Certificate of Service below, pursuant to L.R. 26.1(a)(2), via U.S. Mail, the following discovery pleadings:

- 1) Plaintiffs' First Set of Interrogatories and First Set of Request for Production of Documents Propounded to all Defendants; and,
- 2) Plaintiffs' First Request for Admissions Propounded to All Defendants.

This 3rd day July, 2013.

Respectfully submitted,

HALLIBURTON & LEDBETTER

MARK LEDBETTER

AR# 74175

Attorney for Plaintiffs

TN#17637

254 Court Avenue, Suite 305

hul Lewe

Memphis, TN 38103

(901) 523-8153-phone

(901) 523-8115-fax

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system:

J. Kimbrough Johnson/Marcy Dodds Magee
2900 One Commerce Square
40 S. Main Street
Memphis, TN 38103
Attorneys for Mark P. Clemons
901/525-8721-phone
901/525-6722-fax
Johnsonk@thomasonlaw.com
MageeM@thomasonlaw.com

Albert G. McLean/David Cook
The Hardison Law Firm
119 S. Main Street, Suite 800
Memphis, TN 38103
Attorneys for Babu R. Paidipalli & Pediatric Anesthesiologists, P.A.
901/525-8776 – phone
901/525-8790 – fax
amclean@hard-law.com

This 3rd day of July, 2013.

MARK LEDBETTER, Certifying Attorney

hul Leve